#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	'312 Patent:	arm that is operable to lift a cutting deck assembly.	connected to the deck assembly for pivotal movement
	claims 14 and 19		about a generally vertical axis and about a generally
		This limitation does not recite, and therefore does not	horizontal axis extending in the forward-rearward
		require: a generally L-shaped arm; a horizontally-	direction.
		extending arm; an arm having an inner end pivotally	
		connected to the frame; an arm having an outer end	Intrinsic Evidence
		pivotally connected to the deck assembly; an arm that	
		provides pivotal movement about a generally vertical	Specifications:
		axis; an arm that provides pivotal movement about a	
		generally horizontal axis extending in the forward-	Summary of the Invention:
		rearward direction; or any other unrecifed limitations.	
		Intrinsic Evidence	"The invention also provides an improved
			anangenient for mounting a rotary cutting access on a
		Patent Specifications:	lifting arm so that the deck can move vertically
		'530 Patent col. 1, ll. 34-37: "Each deck is mounted	relative to the frame and can pivot relative to the frame about three mutually perpendicular axes." Col.
		vertically relative to the frame and can pivot relative	1:31-37,
		to the frame about three mutually perpendicular	
		axes."	"Each deck assembly is connected to the frame by a
			generally L-shaped, horizontally-extending lifting
		'530 Patent col. 1, II. 57-62: "Each deck assembly is	arm operable to lift the deck assembly relative to the
		connected to the frame by a generally L-shaped,	frame. Each deck assembly is connected to the frame
		horizontally-extending lifting arm operable to lift the	by its own lifting arm. Each lifting arm has an inner
		deck assembly relative to the frame. Each deck	end pivotally connected to the frame. A cross
		assembly is connected to the frame by its own lifting	member is mounted on the outer end of the lifting
		arm. Each lifting arm has an inner end pivotally	arin for pivotal movement about a generally vertical
		connected to the frame."	in the forward-rearward direction. One end of the
		530 Patent col. 3, l. 66 - col. 4, l. 7: "Each of the	cross member is connected to one of the deck
		deck assemblies 34 is mounted on the frame 12 by a	assembly side plates for pivotal movement about a
		generally L-shaped, horizontally-extending lifting	generally horizontal, laterally-extending axis adjacent
		arm 112, such that each deck assembly is mounted on	the forward ends of the side plates, and the other end
		its own lifting arm 112. The lifting arm 112 has (see	of the cross member is connected to the other side
		FIGS. 2 and 3) a laterally-extending inner leg 116	plate for pivotal movement about the same axis."

	with an inner end connected to the frame 12 for pivotal movement about a generally horizontal axis 120 extending in the forward-rearward direction. The arm 112 also has an outer leg 124 extending in the forward-rearward direction." '530 Patent col. 4, II. 20-31: "A hydraulic assembly 148 (partially shown only in FIG. 5) connected between the arm 112 and the frame 12 pivots the arm about the axis 120 for lifting an d lowering the deck 38. When the deck is lowered for cutting, the hydraulic assembly allows the lifting arm to "float," thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck 38 to the arm 112 via the cross member 128 allows	Col. 1:57 – Col. 2:3. "This construction enables the fawn mower to cut the undulating terrain of a golf course rough and to be controlled for close trimming." Col. 2:4-6. Description of the Drawings: Figures 1-6 are incorporated herein. Description of the Preferred Embodiment: "Each of the deck assemblies 34 is mounted on the frame 12 by a generally L-shaped, horizontally.
	he k ii k	This construction enables the fawn mower to cut the ndulating terrain of a golf course rough and to be ontrolled for close trimming." Col. 2:4-6. escription of the Drawings: gures 1-6 are incorporated herein. escription of the Preferred Embodiment: and 12 by a generally L-shaped, horizontally-
	H K K K K	adulating terrain of a golf course rough and to be naturalled for close trimming." Col. 2:4-6. escription of the Drawings: escription of the Preferred Embodiment: escription of the Areferred Embodiment: and 12 by a generally L-shaped, horizontally-
	× ;; × ;; × ;; × ;; × ;; × ;; × ;; × ;	escription of the Drawings: Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
	'A hydraulic assembly FIG. 5) connected frame 12 pivots the arm an d lowering the deck I for cutting, the e lifting arm to "float," to move vertically connection of the deck as member 128 allows	escription of the Drawings: igures 1-6 are incorporated herein. escription of the Preferred Embodiment: Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
	E	escription of the Drawings: igures 1-6 are incorporated herein. escription of the Preferred Embodiment: Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
		escription of the Preferred Embodiment: Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
	about the axis 120 for lifting and lowering the deck 38. When the deck is lowered for cutting, the hydraulic assembly allows the lifting arm to "float," thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck 38 to the arm 112 wing the cross member 128 allows	escription of the Preferred Embodiment: Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
	38. When the deck is lowered for cutting, the hydraulic assembly allows the lifting arm to "float," thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck 28 to the own 112 wing the cross member 128 allows	escription of the Preferred Embodiment: Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
	hydraulic assembly allows the lifting arm to "float," thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck	Each of the deck assemblies 34 is mounted on the ame 12 by a generally L-shaped, horizontally-
	thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck	ane 12 by a generally L-shaped, horizontally-
	relative to the frame 12. The connection of the deck	ame 12 by a generally L-shaped, horizontally-
	1 28 to the arm 110 wis the cross member 128 allows	
	20 to the ann 112 via the vious memory 120 the	extending litting arm 112, such that each deck
	the deck 38 to pivot relative to the frame 12 about the	assembly is mounted on its own lifting arm 112. The
	three mutually perpendicular axes 132, 136 and 144.	lifting arm 112 has (see FIGS. 2 and 3) a laterally-
	This mounting arrangement enables the deck 38 to	extending inner leg 116 with an inner end connected
	adjust to undulating terrain, thereby substantially	to the frame 12 for pivotal movement about a
	avoiding scalping."	generally horizontal axis 120 extending in the
		forward-rearward direction. The arm 112 also has an
	'530 Patent Claim 3 (col. 5, 11, 5-9): "3. A lawn	outer leg 124 extending in the forward-rearward
	mower as set forth in claim 1 wherein each deck	direction. A cross member 128 is mounted on the
	assembly is connected to the frame by a respective	outer end of the outer leg 124 for pivotal movement
	lifting arm operable to lift the associated deck	about a generally vertical axis 132 and about a
	assembly relative to the frame, such that each of the	generally horizontal axis 136 extending in the
	deck assemblies is connected by its own lifting arm	forward-rearward direction. Each of the opposite,
_	to the frame."	laterally-spaced ends of the cross member 128 has
	2 3 4 4 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	thereon (see FIGS. 2, 3, 5 and 6) a downwardly and
***************************************	'530 Patent Figs. 1-5: Illustrating an embodiment of a	slightly rearwardly extending arm 140. The lower
	lifting arm (112).	end of one arm 140 is connected to the side plate 46
	(312 Patent col. 5, 1, 66 - col. 6, 1, 7; "Each of the	for pivotal movement about a generally horizontal,
***************************************	deck assemblies includes a lifting arm 176 to	laterally-extending axis 144 adjacent the lotward ends of the side plates 46 and 48. The lower end of
	pivotally interconnect each of the deck assemblies	the other arm 140 is connected to the side plate 48 for

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	HILLIAMANATA	with frame 12. Each lifting arm 176 includes a first	pivotal movement about the axis 144." Col. 3:66 –
		end 178 pivotally coupled to deck 160 and a second	Col. 4:19.
		end 180 pivotally coupled to frame 12. Specifically,	
		first end 178 cooperates with a pin 182 to define an	"A hydraulic assembly 148 (partially shown only in
		axis of rotation 184 extending laterally across deck	FIG. 5) connected between the arm 112 and the
		160 perpendicular to the forward-rearward direction	frame 12 pivots the arm about the axis 120 for lifting
		of travel. Pin 182 rotatably couples second end 180 to	an d lowering the deck 38. When the deck is lowered for cutting the hydraulic assembly allows the lifting
		a pracket 100.	arm to "float," thereby allowing the deck 38 to move
		'312 Patent col. 6, II. 13-19: "Second end 180 of	vertically relative to the frame 12. The connection of
		lifting arm 176 includes a third pin 194 pivotally	the deck 38 to the arm 112 via the cross member 128
		interconnecting lifting arm 176 with frame 12. Pin	allows the deck 38 to pivot relative to the frame 12
		194 defines an axis 196 laterally extending across	about the three mutually perpendicular axes 132, 136
		mower 154. As earlier described with reference to	and 144. This mounting arrangement enables the
		FIG. 5, a hydraulic assembly 148 connected between	deck 38 to adjust to undulating terrain, thereby
		lifting arm 176 and frame 12 pivots the arm about	substantially avoiding scalping." Col. 4:20-31.
		axis 196 for lifting and lowering deck 160."	
			'312 Patent:
		'530 Patent Figs. 1-5, and 7-24: Illustrating	
		embodiments of lifting arms.	"Each of the deck assemblies includes a lifting arm
			176 to pivotally interconnect each of the deck
		Claim Differentiation:	assemblies with frame 12. Each lifting arm 176
		The internation of the term "lifting orn" is firther	includes a first end 178 pivotally coupled to deck 160
		I ne merpretation of the lemi multiplaning and is familied	and a second end 180 pivotally coupled to frame 12.
		differentiation by referring to other claims of the	Specifically, first end 178 cooperates with a pin 182
		patents-in-suit.	to define an axis of rotation 184 extending laterally
			rearward direction of travel. Pin 182 rotatably
		(530 Patent Claim 8 (col. 6, 11, 18-64); Claim 8	couples second end 180 to a bracket 186. Bracket 186
		connected to the frame by a respective generally L-	is in turn pivotally coupled to a pair of stantions 188
		shaped, horizontally-extending arm having a	extending from deck 160. A second pin 190 rotatably
		laterally-extending inner leg with an inner end	interconnects bracket 186 and stantions 188 for
		connected to the frame for pivotal movement about a	rotation about an axis 192 longitudinally extending in
		generally horizontal axis extending in the forward-	the forward-rearward direction of the inower 154.
		rearward direction, and the arm having an outer leg	(01: 5:05 - 60: 6:12:

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#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	T AMANAT THE WATER AND THE TAXABLE PARTY TO THE TAX	extending in the forward-rearward direction, the outer	
		leg having an outer end, and wherein the cross	"Second end 180 of lifting arm 176 includes a third
		member is mounted on the outer end of the outer	pin 194 pivotally interconnecting lifting arm 176 with
		leg." The doctrine of claim differentiation requires	frame 12. Pin 194 defines an axis 196 laterally
		this limitation to be different in scope from the term	extending across mower 154. As earlier described
		"lifting arm" as it is used in claim 3.	with reference to FIG. 5, a hydraulic assembly 148
		'530 Patent Claim 10 (col. 7, II. 1-42): Claim 10	connected between litting arm 1/6 and trame 12 nivots the arm about axis 196 for lifting and lowering
		recites " wherein the deck assembly is connected	deck 160." Col. 6:13-19.
•		to the frame by a generally L-shaped, horizontally-	
		extending arm having a laterally-extending inner leg	Claims:
		with an inner end connected to the frame for pivotal	
		movement about a generally horizontal axis	'530 Patent:
		extending in the forward-rearward direction, and the	
		arm having an outer leg extending in the forward-	Claim 3 (relevant representative portions):
		rearward direction, the outer leg having an outer end,	
		and wherein the cross member is mounted on the	"each deck assembly is connected to the frame by a
		outer end of the outer leg." The doctrine of claim	respective lifting arm operable to lift the associated
		differentiation requires this limitation to be different	deck assembly relative to the frame, such that each of
		in scope from the term 'litting arm' as it is used in	the deck assemblies is connected by its own lifting
		claim 3.	arm to the frame." Col. 5:5-9.
		'530 Patent Claim 17 (col. 9, II. 19-29): Claim 17	Claim 17 (relevant representative portions):
		recites " each of the deck assemblies being	•
		connected to the frame by a respective generally L-	"each of the deck assemblies being connected to the
		shaped, horizontally-extending liffing arm operable	frame by a respective generally L-shaped.
		to lift the associated deck assembly relative to the	horizontally-extending lifting arm operable to lift the
		frame, such that each of the deck assemblies is	associated deck assembly relative to the frame, such
		connected by its own lifting arm to the frame, each	that each of the deck assemblies is connected by its
		arm having a laterally-extending inner leg with an	own lifting arm to the frame, each arm having a
		Inner end connected to the frame for pivotal	laterally-extending inner leg with an inner end
		movement about a generally horizontal axis	connected to the frame for pivotal movement about a
		extending in the forward-rearward direction, and each	generally horizontal axis extending in the forward-
		arm having an outer leg extending in the forward-	rearward direction, and each arm having an outer leg
		rearward direction The separate, additional	extending in the forward-rearward direction, the outer

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#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		recitation of structures relating to the lifting arm demonstrates that the term "lifting arm" does not, in and of itself, include these limitations. If it did, claim 17 would be redundant.	leg having an outer end, and a cross member mounted on the outer end of the outer leg for pivotal movement about a generally vertical axis and about a generally horizontal axis extending in the forward-rearward direction, the cross member having opposite, laterally-spaced ends, one of the cross member ends being connected to one of the side plates of the associated deck assembly for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other of the cross member ends being connected to the other of the side plates of the associated deck assembly for pivotal movement about the generally horizontal, laterally-extending axis." Col. 9:19-Col. 10:12.
			'311 Patent
AMAIIII			Claim 3 and 11 (relevant representative portions):
			"each deck assembly is connected to said frame by a respective lifting arm operable to lift the associated deck assembly relative to said frame, such that each of said deck assemblies is connected by its own lifting arm to said frame." Col. 5:18-22; Col. 6:34-38.
			<u>'312 Patent:</u>
			Claim 14 (relevant representative portions):
			"The lawn mower of claim 1 further including a lifting arm pivotally interconnecting each of said front deck assemblies to said frame, said lifting arm pivoting about an axis laterally extending across said

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#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
			deck assembly substantially parallel to the ground and perpendicular to the direction of travel." Col. 9:17-22.
			Claim 19 (relevant representative portions):
			"a lifting arm adapted to pivotally interconnect said cutting deck assembly and the frame." Col. 10:4-5.
			Prosecution History:
			.530 Patent:
			Paper 4, at p. 4. Paper 6, p. 12.
8.	"Side plates"	Proposed Construction	Proposed Construction
	'530 Patent: claim 4 '311 Patent:	The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that	Thin, flat pieces of metal laterally-spaced and generally vertically-extending from the rear roller to the front wheels.
	claims 4 and 12 '312 Patent:	they do require construction, "side plates" means: plate-like components on each side of the deck	Intrinsic Evidence
	Olanni 17	This limitation does not recite, and therefore does not	Specification
		require, the "side plates" to be generally vertically extending from the rear roller to the front wheels, and	Summary of the Invention:
		does not have any other unrecited limitations.	"Each of the front and rear deck assemblies includes
		Intrinsic Evidence	a pair of faterally-spaced, generally vertically extending side plates, front wheels supporting the side plates for movement over the ground." Col.

7	Claim Town	Distriction Despessal Construction	Defendant's Duanceed Construction
ŧ		LIAIMUII S L'IODOSCU COUSILUCUOII	Defenuant's Froposeu Construction
		Patent Specifications:	1:45-47.
		'530 Patent col. 1, 11, 44-54: "Each of the front and rear deck assemblies includes a pair of laterally-	Detailed Description of the Preferred Embodiment:
		spaced, generally vertically-extending side plates,	
		front wheels supporting the side plates for movement	"Two front wheels 50 rotate about an axle 54 (FIGS.
		over the ground, and a rear roller extending between	2 and 3) extending between the side plates 46 and 48
		the side plates and supporting the side plates for	in front of the deck 38, such that each front wheel 50
		movement over the ground. Each deck assembly also	supports one of the side plates 46 and 48 and the deck
		includes a single-spindle cutting deck located	38 for movement over the ground." Col. 3:13-18.
		between the side plates and in front of the roller, the	
		deck being mounted on the side plates such that the	"A rear roller 58 extends between the side plates 46
		height of the deck relative to the ground is	and 48 and also supports the side plates 46 and 48
		adjustable."	and the deck 38 for movement over the ground." Col.
			3:17-19.
		.530 Patent col 1. 1. 65 - col. 2, 1. 3: "One end of the	
		cross member is connected to one of the deck	'312 Patent Specification:
		assembly side plates for pivotal movement about a	
		generally horizontal, laterally-extending axis adjacent	"With reference to FIGS. 9 and 10, each of the
		the forward ends of the side plates, and the other end	cutting deck assemblies 156 and 158 includes a
		of the cross member is connected to the other side	single spindle mulching deck 160 defining a
		plate for pivotal movement about the same axis."	downwardly opening space. Deck 160 is supported
			by a pair of laterally spaced, generally vertically
		'530 Patent col. 3, II. 8-19: "The deck 38 is located	extending side plates 162 and 164. Two caster wheels
		between and supported by a pair of laterally-spaced,	166 are pivotally coupled to a cross-arm 168
		generally vertically-extending side plates 46 and 48.	extending between side plates 162 and 164, such that
		The term "lateral" is used herein to mean the	each caster wheel 166 supports one of the side plates
		other i e nemendicular to the forward-rearward	162 and 164 and the deck 160 for movement over the
		direction. Two front wheels 50 rotate about an axle	ground." Col. 5:56.
		54 (FIGS. 2 and 3) extending between the side plates	"A according to 1 and 22 common the offer when
		46 and 48 in front of the deck 38, such that each front	Accordingly, folicis 230 support the side plates and
		wheel 50 supports one of the side plates 46 and 48	a acer 245 ioi iiioveiiiciii ovei uie giouiia. Coi. 7.37
		and the deck 38 for movement over the ground. A	·
		rear roller 58 extends between the side plates 46 and	"As shown in FIG. 15 another embodiment 250 of a
		The Public Address of the Control of	TAS SHOWN IN TAC. 13, WINDING WINDOWN 230 OF W

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#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
E	Claim Lyk		cutting deck assembly includes a pair of rear wheels
		deck 38 for movement over the ground."	252 coupled to a pair of side plates 254 and 256,
			respectively. Rear wheels 252 function to support
		'530 Patent col. 3, 11. 22-44: "The deck 38 is mounted	side plates 254 and 256 along with a mower deck 258
		on the side plates 46 and 48 such that the height of	for movement over the ground." Col. 7:13-18.
		he deck 38 relative to the ground is adjustable. In the	
		illustrated construction, the deck 38 includes spaced	"Another cutting deck embodiment 290 is depicted in
		deck plates 66 and 68 (FIGS. 3 and 5) extending	FIG. 19, Cutting deck assembly 290 includes a
		upwardly adjacent the side plates 46 and 48,	plurality of front caster wheels 292 pivotally coupled
-1.0		respectively. The upper end of each side plate 46 or	to a actuate cross member 294 interconnecting a first
		48 has thereon (see FIG. 2) generally horizontal.	side plate 296 and a second side plate 298." Col.
		inwardly-extending ears 69 and 70, with the ear 69	7,43-47.
		adjacent the front of the side plate and the ear 70	
		adjacent the rear of the side plate. Fixed to the ears	"Rear wheels 302 are pivotally coupled to each of the
		69 and 70 of each side plate 46 or 48 is an elongated	side plates 296 and 298. Each of the segments of
		plate member 71 having outwardly-extending ears 72	segmented rear roller assembly 304 are rotatably
		and 73 respectively secured to the ears 69 and 70 by	coupled and aligned along an axle 306." Col. 7:55-
		suitable means such as bolts or screws 74. Each side	58
		plate 46 or 48 and the corresponding plate member	
		71 has therein (see FIGS. 4 and 6) a series of holes	"FIG. 20 depicts yet another cutting deck assembly
		76. Each of the deck plates 66 and 68 has therein	308 having a stepped and segmented rear roller
		several vertically-spaced series of holes 78. Bolts 80	assembly 310. Rear roller assembly 310 includes a
		extending through holes 76 in the side plates 46 and	pair of outboard rollers 312 coupled to side plates
		48 and in the plate members 71 and through holes 78	314 and 316. Rear roller assembly 310 also includes
		in the deck plates 66 and 68 secure the deck 38 to the	an inboard set of rollers 318 positioned between side
		side plates 46 and 48. The height of the deck 38 is	plates 314 and 316 and rotatably mounted on a
		adjusted by changing the holes 78 in the deck plates	stepped axle shaft 320." Col. 7:59-65.
		66 and 68 and/or the holes in the side plates 46 and	
		48 and in the plate members 71 through which the	Patent Claims:
		bolts 80 extend."	
		The state of the s	'530 Patent:
		250 Patent col. 4, 11, 14-19; The lower end of one	
		arm 140 is connected to the side plate 46 for pivotal	Claim 4 (relevant representative portions):
		movement about a generally horizontal, talefally-	"A form mourer as set forth in claim 1 wherein each
	***************************************		A lawn mower as set total in ciann i wherein each

7	Cloim Torm	Plaintiff's Pronosed Construction	Defendant's Proposed Construction
£	Claim 10 m		of the front and rear deck assemblies includes a pair
		Side piales 40 and 46. The lower child of the other arm	of the front wild remain the working to extending
		140 is connected to the side plate 48 for pivotal	of faterally-spaced, generally vertically-exterious
		movement about the axis 144."	side plates having forward ends, a first front wheel
			supporting one of the side plates for movement over
		'530 Patent Figs. 2-6: Illustrating side plates (46, 48).	the ground, and a second front wheel supporting the
			other of the side plates for movement over the
		'312 Patent col. 5, 11. 50-63: "Deck 160 is supported	ground, wherein the rear roller extends between the
		by a pair of laterally spaced, generally vertically	side plates and supports the side plates for movement
		extending side plates 162 and 164. Two caster wheels	over the ground, wherein the associated deck is
		166 are pivotally coupled to a cross-arm 168	located between the side plates and in front of the
		extending between side plates 162 and 164, such that	roller and is mounted on the side plates such that the
		each caster wheel 166 supports one of the side plates	height of the deck relative to the ground is adjustable
		162 and 164 and the deck 160 for movement over the	hy changing the position of the deck relative to the
•		ground. Each of the caster wheels 166 is coupled to	side plates. Col. 5:9-22.
		cross-arm 168 via a caster shaft 170. Accordingly,	
		each of caster wheels 166 may rotate about an axle	Claim 7 (relevant representative portions):
		shaft 172 and also pivot about caster shaft 170 when	
		the vehicle is turning. A continuous, unitary roller	"one of the cross member ends being connected to
		174 extends between side plates 162 and 164 and also	one of the side plates of the associated deck assembly
			for pivotal movement about a generally horizontal,
		movement over the ground."	laterally-extending axis adjacent the forward ends of
			the side plates, and the other of the cross member
		'312 Patent col. 6, 11. 20-33: "An alternate	ends being connected to the other of the side plates of
		embodiment cutter deck assembly 198 is depicted in	the associated deck assembly for pivotal movement
••		FIG. 11. A segmented first roller 200 is positioned	about the generally horizontal, laterally-extending
		behind a deck 201 laterally extending a distance less	axis, the ends of the cross member having thereon
		than the width of deck 201. Segmented roller 200	respective downwardly extending arms, the arms
		includes a plurality of roller segments 200A, 200B,	having respective lower ends, the lower end of one of
		200C and 200D. It should be appreciated that	the arms being connected to one of the side plates for
		segmented first roller 200 may include any number of	pivotal movement about the generally horizontal,
		roller segments without departing from the scope of	Col. 6:1-16.
		the present invention. A second roller 202 is	
		positioned forward of first roller 200. Second roller	Claim 8 (relevant representative portions):
		202 is coupled to a side plate 203 and generally	
		aligned with an outside edge of deck 201. A third	"one of the cross member ends being connected to
		The second secon	

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		roller 204 is aligned laterally with second roller 202	one of the side plates of the associated deck assembly
		and positioned forward of first roller 200. Third roller	for pivotal movement about a generally horizontal,
		204 is coupled to a side plate 205 and generally	laterally-extending axis adjacent the forward ends of
		aligned with an outside edge of deck 201."	the side plates, and the other of the cross member
			ends being connected to the other of the side plates of
		'312 Patent col. 6, l. 66 - col. 7, l. 12: "Another	the associated deck assembly for pivotal movement
		cutting deck assembly is depicted at reference	about the generally horizontal" Col. 6:1-8.
		numeral 234 in FIG. 13. Cutting deck assembly 234	
		includes a plurality of separate rollers 236 aligned	Claim 12 (relevant representative portions):
		and rotatably mounted to axle 238. Axle 238 is	
		coupled to a first side plate 242 and a second side	A lawn mower as set forth in claim 12 wherein the
		plate 244. Accordingly, rollers 236 support the side	deck assembly also includes a first front wheel
		plates and a deck 245 for movement over the ground.	supporting one of the side plates for movement over
		In similar fashion and in reference to FIG. 14, a	the ground, a second front wheel supporting the other
		single one-piece unitary roller 246 may be	of the side plates for movement over the ground, and
	**	incorporated to support the side plates and deck."	a rear roller extending between the side plates and
			supporting the side plates for movement over the
		'312 Patent col. 7, 11. 14-22: "As shown in FIG. 15,	ground, Col. 8:28-30.
		another embodiment 250 of a cutting deck assembly	
	***	includes a pair of rear wheels 252 coupled to a pair of	'312 Patent:
		side plates 254 and 256, respectively. Rear wheels	
		252 function to support side plates 254 and 256 along	Claim 19 (relevant representative portions):
		with a mower deck 258 for movement over the	
		ground. Additionally, cutter deck assembly 250	"a pair of laterally-spaced, generally vertically
		includes a unitary, one-piece roller 260 extending	extending side plates having forward ends;
		between side plates 254 and 256 a distance less than	
		the entire width of deck 258."	a first front wheel supporting one of said side plates
		(212 Datant oc) 7 11 /2 58. Another continue deck	for movement over the ground;
		ombodiment 200 is denisted in EIG 10 Cutting deck	
		assembly 290 includes a plurality of front caster	a second front wheel supporting the other of said side
		wheels 292 pivotally coupled to a arcuate cross	plates for movement over the ground;
		member 294 interconnecting a first side plate 296 and	a mallar avtanding haturaan eaid eida nigtae eiinnorting
		a second side plate 298. Each of front caster wheels	said side plates for movement over the ground.
		292 is pivotally coupled to cross member 294 via a	wherein said deck is coupled to said side plates and

Defendant's Proposed Construction	located said dec changin side pla	Each end of the rear roller is connected to a respective side plate. Intrinsic Evidence Specification: Summary of the Invention: Summary of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-stending side plates, front wheels supporting the side plates for movement over the ground, and a rear roller extending between the side plates and
Dlaintiff's Proposed Construction	caster pin 300 Cutting deck 290 also includes a pair of rear wheels 302 and a rear segmented roller assembly 304. Rear wheels 302 are pivotally coupled to each of the side plates 296 and 298. Each of the segments of segmented rear roller assembly 304 are rotatably coupled and aligned along an axle 306." '312 Patent col. 7, 11. 59-65: "FIG. 20 depicts yet another cutting deck assembly 308 having a stepped and segmented rear roller assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates 314 and 316. Rear roller assembly 310 also includes an inboard set of rollers 318 positioned between side plates 314 and 316 and rotatably mounted on a stepped axle shaft 320." '312 Patent Figs. 2-9, and 11-24: Illustrating various embodiments of side plates.	The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that they do require construction, "rear roller extends between the side plates and supports the side plates for movement over the ground" means: the rear roller extends between the side plates in such a way to support them for movement over the ground. This limitation does not recite, and therefore does not require, the ends of the rear roller to be connected directly to either of the side plates, and does not have any other unrecited limitations.
Claim Torm		"rear roller extends between the side plates and supports the side plates for movement over the ground" '530 Patent: claim 4 '311 Patent: claims 4 and 12 '312 Patent: claims 4 and 12
#		6

##	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	rimonoma da miririgi	Intrinsic Evidence	supporting the side plates for movement over the
		Patent Specifications:	spindle cutting deck located between the side plates
		'530 Patent col 1 11 44-56: "Fach of the front and	and in front of the roller, the deck being mounted on
		rear deck assemblies includes a pair of laterally-	the side plates such that the height of the deep relative to the ording adjustable. The roller extends
		spaced, generally vertically-extending side plates,	across substantially the entire width of the deck. The
		front wheels supporting the side plates for movement	roller resists scalping and stripes the grass, both of
		over the ground, and a rear roller extending between the side plates and supporting the side plates for	which are aesthetically desirable." Col. 1:44-56.
		movement over the ground The roller extends	Description of the Drawings:
		across substantially the entire width of the deck. The	•
		roller resists scalping and stripes the grass, both of which are aesthetically desirable."	Figures 1-6 are incorporated herein by reference.
			Description of the Preferred Embodiment:
		'530 Patent col. 3, II. 16-21: "A rear roller 58 extends	
		between the side plates 46 and 48 and also supports	"The deck 38 is located between and supported by a
		the side plates 40 and 40 and the deck 50 tol	pair of laterally-spaced, generally vertically-
		the dealt 20 and extends corres substantially the	extending side plates 46 and 48. The term "lateral" is
		life upon 30 and extends across substantially upon the patter swidth of the deck 38. The roller 58 regists	used herein to mean the direction from one side of
		scalning and strines the grass."	the lawn mower to the other, i.e., perpendicular to the
		scaiping and surpes in Brass.	forward-rearward direction. I wo front wheels 50
		'530 Patent Figs. 2, 3 & 5: Showing a roller (58)	rotate about an axle 54 (FIGS. 2 and 3) extending hetween the side plates 46 and 48 in front of the deck
		attached to side plates (46, 48) by an axle	38. such that each front wheel 50 supports one of the
		(unnumbered).	side plates 46 and 48 and the deck 38 for movement
		'312 Patent col. 5, Il. 60-65: "A continuous, unitary	over the ground. A rear roller 58 extends between the
		roller 174 extends between side plates 162 and 164	side plates 46 and 48 and also supports the side plates
		and also supports side plates 162 and 164 and deck	40 and 46 and the deck 30 to intovenient over the
		160 for movement over the ground. In this	extends across substantially the entire width of the
		embodiment, roller 1/4 is positioned bening deck	deck 38. The roller 58 resists scalping and stripes the
		of deck 160." Col. 5:60-65.	grass." Col. 3:8-21.
		'312 Patent col. 6, Il. 20-33: "An alternate	'312 Patent:

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	TO THE PARTY OF TH	embodiment cutter deck assembly 198 is depicted in	
		FIG. 11. A segmented first roller 200 is positioned	"Deck 160 is supported by a pair of laterally spaced,
		behind a deck 201 laterally extending a distance less	generally vertically extending side plates 162 and
		than the width of deck 201. Segmented roller 200	164. Two caster wheels 166 are pivotally coupled to
		includes a plurality of roller segments 200A, 200B,	a cross-arm 168 extending between side plates 162
		200C and 200D A second roller 202 is positioned	and 164, such that each caster wheel 166 supports
		forward of first roller 200. Second roller 202 is	one of the side plates 162 and 164 and the deck 160
		coupled to a side plate 203 and generally aligned with	for movement over the ground. Each of the caster
		an outside edge of deck 201. A third roller 204 is	wheels 166 is coupled to cross-arm 168 via a caster
		aligned laterally with second roller 202 and	shaft 170. Accordingly, each of caster wheels 166
		positioned forward of first roller 200. Third roller 204	may rotate about an axle shaft 172 and also pivot
		is coupled to a side plate 205 and generally aligned	about caster shaft 170 when the vehicle is turning. A
		with an outside edge of deck 201"	continuous, unitary roller 174 extends between side
			plates 162 and 164 and also supports side plates 162
		'312 Patent col. 6, l. 66 - col. 7, l. 5: "Another cutting	and 164 and deck 160 for movement over the ground.
		deck assembly is depicted at reference numeral 234	In this embodiment, roller 174 is positioned behind
		in FIG. 13. Cutting deck assembly 234 includes a	deck 160 and extends substantially across the entire
		plurality of separate rollers 236 aligned and rotatably	width of deck 160." Col. 5:50-65.
***********		mounted to axle 238. Axle 238 is coupled to a first	
		side plate 242 and a second side plate 244.	"Another cutting deck assembly is depicted at
		Accordingly, rollers 236 support the side plates and a	reference numeral 234 in FIG. 13. Cutting deck
		deck 245 for movement over the ground."	assembly 234 includes a plurality of separate rollers
			236 aligned and rotatably mounted to axle 238. Axle
		'312 Patent col. 7, Il. 13-21: "As shown in FIG. 15,	238 is coupled to a first side plate 242 and a second
		another embodiment 250 of a cutting deck assembly	side plate 244. Accordingly, rollers 236 support the
		includes a pair of rear wheels 252 coupled to a pair of	side plates and a deck 245 for movement over the
		side plates 254 and 256, respectively. Rear wheels	ground. Rollers 236 are preferably axially spaced
		252 function to support side plates 254 and 256 along	apart a predetermined distance along axle 238 to
		with a mower deck 258 for movement over the	provide an alternate striping effect. It should be
		ground. Additionally, cutter deck assembly 250	appreciated that rollers 236 are positioned such that
		includes a unitary, one-piece roller 260 extending	they do not extend substantially across the entire
		between side plates 254 and 256 a distance less than	width of a mower deck 245. In similar fashion and in
		the entire width of deck 258."	reference to FIG. 14, a single one-piece unitary roller
			246 may be incorporated to support the side plates
	***************************************	312 Patent col. /, II. 53-58; "Cutting deck 290 also	and deck. Koller 240 does not extend the chille widin

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		includes a pair of rear wheels 302 and a rear	of the mower deck." Col. 6:66 – Col. 7:13.
		segmented roller assembly 504. Rear wheels 502 are pivotally counled to each of the side plates 796 and	"As shown in FIG 15 another embodiment 250 of a
		298. Each of the segments of segmented rear roller	cutting deck assembly includes a pair of rear wheels
		assembly 304 are rotatably coupled and aligned along	252 coupled to a pair of side plates 254 and 256,
		an axle 306."	respectively. Rear wheels 252 function to support side plates 254 and 256 along with a mower deck 258
		'312 Patent col. 7, 11. 59-67: "FIG. 20 depicts yet	for movement over the ground. Additionally, cutter
		another cutting deck assembly 308 having a stepped	deck assembly 250 includes a unitary, one-piece
~~~~		and segmented rear roller assembly 310. Kear roller assembly 310 includes a pair of outboard rollers 312	roller 260 extending between side plates 254 and 256
		coupled to side plates 314 and 316. Rear roller	Col. 7:14-22.
		assembly 310 also includes an inboard set of rollers	
		318 positioned between side plates 314 and 316 and	"FIG. 20 depicts yet another cutting deck assembly
		roller assembly 310 provides a strined nation having	308 having a stepped and segmented rear roller
		a width greater than the width of a deck 322."	assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates
			314 and 316. Rear roller assembly 310 also includes
		various arrangements of rollers used with outling	an inboard set of rollers 318 positioned between side
		decks.	plates 314 and 316 and rotatably mounted on a
			stepped axie shaft 320. Kear roller assembly 310
			provides a striped pattern having a width greater than the width of a deck 322." Col. 7:59-67.
			Patent Claims:
			'530 Patent:
			Claim 4 (relevant representative portions):
			"each of the front and rear deck assemblies includes a
			pair of laterally-spaced, generally vertically-
			extending side plates having forward ends, a first front wheel supporting one of the side plates for
			movement over the ground, and a second front wheel

Claim Term	n Plaintiff's Proposed Construction	Defendant's Proposed Construction
		supporting the other of the side plates for movement over the ground, wherein the rear roller extends between the side plates and supports the side plates for movement over the ground, wherein the associated deck is located between the side plates and in front of the roller and is mounted on the side plates such that the height of the deck relative to the ground is adjustable by changing the position of the deck relative to the side plates." Col. 5:10-22.
"each rear deck	k Proposed Construction	Proposed Construction
aligned with a respective gap	The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that	Every rear deck assembly is located behind a gap defined by two adjacent front deck assemblies.
front deck		Intrinsic Evidence
assemblies	between adjacent front deck assemblies" means: rear	Specifications:
530 Patent: claim 1	the front deck assemblies.	Summary of the Invention:
'311 Patent: claims 1 and 8	Intrinsic Evidence	"The lawn mower has single-spindle cutting decks
'312 Patent: claims 1 and 24	Patent Specifications:	attached directly to the frame on which the operator rides, with a front row of two or more cutting decks
	'530 Patent Abstract: "A gang-type rotary lawn mower including at least two side-by-side front rotary cutting deck assemblies mounted on the frame.	in front of the front wheels, and with a rear row of one or more cutting decks between the front and rear wheels." Col. 1:27-31.
	the front deck assemblies defining a gap between adjacent front deck assemblies, and at least one rear	Description of the Drawings:
	rotary cutting deck assembly mounted on the frame behind the front deck assemblies, each rear deck	Figure 1 is incorporated herein by reference.
	assembly being aligned with a respective gap between adjacent front deck assemblies"	Description of the Preferred Embodiment:
	'530 Patent col. 4, 1, 2 - col. 3, 1, 5: The lawn mower	"The lawn mower 10 further comprises front and rear

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	THE PROPERTY OF THE PROPERTY O		rows 26 and 30, respectively, of cutting deck
		respectively, of cutting deck assemblies 34 As is	assemblies 34. More particularly, in the illustrated
		known in the art, each rear deck assembly 34 is	construction, the lawn mower 10 has three side-by-
		aligned with the gap between two adjacent front deck	side front cutting deck assemblies 34 in front of the
			front wheels 14, and two rear cutting deck assemblies
			34 behind the front wheels 14 and in front of the rear
		'530 Patent Fig. 1: showing rear cutting deck	wheels 16. As is known in the art, each rear deck
		assemblies (34) being located behind gaps between	assembly 34 is aligned with the gap between two
		adjacent front cutting deck assemblies (34).	adjacent front deck assemblies 34." Col. 2:64-Col.
		(21) Datent of \$ 11 15_23 avm mower 150	3:5.
		nreferably includes three side-by-side front cutting	911 Dotont Chariffootion.
			JIZ FAIGH SPOUTIVARIOH.
		rear cutting deck assemblies 152 positioned between	"Lawn mower 150 preferably includes three side-by-
		the front wheels 14 and in front of the rear wheels 16.	side front cutting deck assemblies 34 in front of the
		Each of the rear cutting deck assemblies 152 is	wheels 14 and two rear cutting deck assemblies 152
		positioned within the gap between two adjacent front	positioned between the front wheels 14 and in front
		deck assemblies 34."	of the rear wheels 16. Each of the rear cutting deck
		100 December 2010 11 CA CE 64 2000 1000 1000 1000 1000 1000 1000 100	assemblies 152 is positioned within the gap between
		312 Fatent col. 6, 11, 34-65: A rear cutting deck	two adjacent front deck assemblies 34." Col. 5:15-
		forward cutting accomblise 218 Rear cutting deck	22.
		101 Wald cutting assemblics 2.10. Near cutting ucen	
		assembly 228 is preferably laterally centered between	Patent Claims:
		torward cutting deck assemblies 218 to assure that all	
		of the grass across the width of mower 212 is cut. In addition forward cutting deck assemblies 218 are	,530 Patent:
		spread apart a distance less than the cutting width of	Claims 1 7 8 and 17 (relation transcentative
		rear cutting deck assembly 228 to further assure a	Ciaillis 1, 7, 0, and 17 (refevant representative nortions):
		complete width of cut when mower 212 is turning.	portrois).
		Rear cutting deck assembly 228 is aligned with rear	"each rear deck assembly being aligned with a
		wheel 216 such that a first roller 230 and a second	respective gap between adjacent front deck
		roller 232 cooperate with rear wheel 216 to stripe the	assemblies" Col. 4:56-58; Col. 5:52-54; Col. 6:31-
		grass."	33; 65-67.
		'312 Patent Figs. 1, 7, 8, 12, 16-18: showing rear	'311 Patent:
		WARMAN AND THE PARTY OF THE PAR	

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		cutting deck assemblies being located behind gaps between adjacent front cutting deck assemblies.	"at least two front rotary cutting deck assemblies mounted to said frame in front of said front wheels and in a side-by-side relationship, wherein each of said front cutting deck assemblies defines a front cutting path; and at least one rear rotary cutting deck assembly being mounted on said frame behind said front deck assembly defining a rear cutting path extending laterally to overlap a portion of each of said front cutting paths, wherein each of said front and rear deck assemblies has at least one cutting blade mounted on a spindle for rotation therewith and at least one roller to support each of said deck assemblies for movement over the ground, said roller extending substantially across the entire width of said cutting path." Col. 6:18-33.
II.	"roller"	Proposed Construction	Proposed Construction
	'530 Patent: claim 1	The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that	A rotating device that resists scalping and stripes the grass.
	claims 2 and 10 '312 Patent:	they do require construction, "roller" means: <u>a device</u> that rolls.	Intrinsic Evidence
	claims 1, 19 and 24	Intrinsic Evidence	Specification:
		Patent Specifications:	Background of the Invention:
		'530 Patent col. 1, 1l. 44-56: "Each of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates,	"It is generally recognized that rotary mowers are better suited for cutting tall grass, where scalping is not a problem, while reel mowers are better for shorter cutting." Col. 1:7-9.

## REVISED JOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		front wheels supporting the side plates for movement over the ground, and a rear roller extending between the side plates and supporting the side plates for movement over the ground The roller extends across substantially the entire width of the deck. The roller resists scalping and stripes the grass, both of which are aesthetically desirable."	"Thus, rotary mowers have not been used to cut golf course roughs, which require close trimming and the ability to cut undulating terrain at a relatively short length." Col. 1:16-19.  Summary of the Invention:
		530 Patent col. 3, II. 16-21: "A rear roller 58 extends between the side plates 46 and 48 and also supports the side plates 46 and 48 and the deck 38 for	The Summary of the Invention describes the invention as including a roller that resists scalping and stripes the grass.
		the deck 38 and extends across substantially the entire width of the deck 38. The roller 58 resists scalping and stripes the grass."	"The invention provides a gang-type rotary lawn mower suitable for cutting a golf course rough." Col. 1:23-24.
-1		'530 Patent Figs. 2, 3 & 5: Showing a roller (58) attached to side plates (46, 48) by an axle (unnumbered).	"The roller resists scalping and stripes the grass, both of which are aesthetically desirable." Col. 1:55-56.
		'312 Patent col. 5, Il. 60-65: "A continuous, unitary roller 174 extends between side plates 162 and 164 and also supports side plates 162 and 164 and deck	"This construction enables the lawn mower to cut the undulating terrain of a golf course rough and to be controlled for close trimming." Col. 2:4-8.
		160 for movement over the ground. In this embodiment, roller 174 is positioned behind deck	Description of the Drawings:
		160 and extends substantially across the entire width of deck 160." Col. 5:60-65.	Figures 1-24 are incorporated herein by reference.
		'312 Patent col. 6, Il. 20-41: "An alternate	'312 Patent:
		embodiment cutter deck assembly 198 is depicted in FIG. 11. A segmented first roller 200 is positioned behind a deck 201 laterally extending a distance less than the width of deck 201. Segmented roller 200 includes a plurality of roller segments 200A, 200B, 200C and 200D A second roller 202 is positioned	"A continuous, unitary roller 174 extends between side plates 162 and 164 and also supports side plates 162 and 164 and deck 160 for movement over the ground. In this embodiment, roller 174 is positioned behind deck 160 and extends substantially across the entire width of deck 160." Col. 5:60-65.

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		forward of first roller 200. Second roller 202 is	
		coupled to a side plate 203 and generally aligned with	"A segmented first roller 200 is positioned behind a
		an outside edge of deck 201. A third roller 204 is	deck 201 laterally extending a distance less than the
		aligned laterally with second roller 202 and	width of deck 201. Segmented roller 200 includes a
		positioned forward of first roller 200. Third roller 204	plurality of roller segments 200A, 200B, 200C and
***		is coupled to a side plate 205 and generally aligned	200D. It should be appreciated that segmented first
		with an outside edge of deck 201. First roller 200,	roller 200 may include any number of roller segments
		second roller 202 and third roller 204 are positioned	without departing from the scope of the present
		to define a substantially uninterrupted rolling path	invention. A second roller 202 is positioned forward
		206 to provide an aesthetically pleasing striping of	of first roller 200. Second roller 202 is coupled to a
		the grass. Second roller 202 and third roller 204 may	side plate 203 and generally aligned with an outside
		be sized such that a portion of each of these rollers	edge of deck 201. A third roller 204 is aligned
		overlaps first roller 200. Alternatively, an inner edge	laterally with second roller 202 and positioned
		208 of second roller 202 may be aligned with an	forward of first roller 200. Third roller 204 is coupled
		outer edge 210 of first roller 200 to provide the	to a side plate 205 and generally aligned with an
		substantially uninterrupted roller path."	outside edge of deck 201. First roller 200, second
		•	roller 202 and third roller 204 are positioned to define
		'312 Patent col. 6, II. 42-53: "With reference to FIG.	a substantially uninterrupted rolling path 206 to
		12, a three-wheeled mower 212 includes two forward	provide an aesthetically pleasing striping of the grass.
		wheels 214 and one rear wheel 216. Two forward	Second roller 202 and third roller 204 may be sized
		cutting deck assemblies 218 are aligned with each of	such that a portion of each of these rollers overlaps
		the wheels 214 in the longitudinal (forward-rearward)	first roller 200. Alternatively, an inner edge 208 of
		direction of travel and laterally aligned with each	second roller 202 may be aligned with an outer edge
		other. Each of cutting deck assemblies 218 includes a	210 of first roller 200 to provide the substantially
		pair of segmented rollers 220 aligned along an axis of	uninterrupted roller path." Col. 6:20-42.
		rotation 222 and laterally spaced apart from one	
····		another a predetermined distance 224. Each of the	"Each of cutting deck assemblies 218 includes a pair
		forward wheels 214 is aligned with the space	of segmented rollers 220 aligned along an axis of
		between rollers 220 such that the combination of	rotation 222 and laterally spaced apart from one
		rollers 220 and wheel 214 form a rolling path 226 to	another a predetermined distance 224. Each of the
		provide the striping effect."	forward wheels 214 is aligned with the space
			Delween Ioners 220 such that the computation of
		'312 Patent col. 6, 11, 62-65: "Rear cutting deck	rollers 220 and wheel 214 form a rolling path 220 to
		assembly 228 is aligned with rear wheel 216 such	provide the striping effect." Col. 0:47-33.
	***************************************	that a first folier 230 and a second folier 232	

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	***************************************	cooperate with rear wheel 216 to stripe the grass."	"Rear cutting deck assembly 228 is aligned with rear
			wheel 216 such that a first roller 230 and a second
••••••		'312 Patent col. 6, l. 67 - col. 7, l. 12: "Cutting deck	roller 232 cooperate with rear wheel 216 to stripe the
		assembly 234 includes a plurality of separate rollers	grass." Col. 6:62-65.
		236 aligned and rotatably mounted to axle 238. Axle	
		238 is coupled to a first side plate 242 and a second	"Another cutting deck assembly is depicted at
		side plate 244. Accordingly, rollers 236 support the	reference numeral 234 in FIG. 13. Cutting deck
		side plates and a deck 245 for movement over the	assembly 234 includes a plurality of separate rollers
		ground. Rollers 236 are preferably axially spaced	236 aligned and rotatably mounted to axle 238. Axle
		apart a predetermined distance along axle 238 to	238 is coupled to a first side plate 242 and a second
		provide an alternate striping effect. It should be	side plate 244. Accordingly, rollers 236 support the
		appreciated that rollers 236 are positioned such that	side plates and a deck 245 for movement over the
		they do not extend substantially across the entire	ground. Rollers 236 are preferably axially spaced
		width of a mower deck 245. In similar fashion and in	apart a predetermined distance along axle 238 to
		reference to FIG. 14, a single one-piece unitary roller	provide an alternate striping effect. It should be
		246 may be incorporated to support the side plates	appreciated that rollers 236 are positioned such that
		and deck. Roller 246 does not extend the entire width	they do not extend substantially across the entire
		of the mower deck."	width of a mower deck 245. In similar fashion and in
			reference to FIG. 14, a single one-piece unitary roller
		'312 Patent col. 7, II. 19-22: "Additionally, cutter	246 may be incorporated to support the side plates
		deck assembly 250 includes a unitary, one-piece	and deck. Roller 246 does not extend the entire width
		roller 260 extending between side plates 254 and 256	of the mower deck." Col. 7:1-13.
		a distance less than the entire width of deck 258."	
			Patent Claims:
		'312 Patent col. 7, 11, 23-33: "Referring to FIGS. 16-	
		18, each of the forward and rear cutting deck	'530 Patent:
		assemblies may be positioned relative to another in a	
		number of ways. Specifically, a forward cutting deck	Claim 1 (relevant representative portions):
		assembly 262 includes a roller 264 having an inboard	
		edge 266 which may be positioned in an overlapping	"a rear roller supporting the deck for movement over
		relationship with a rear cutting deck assembly 267	the ground, the deck having a width such that the
		having a roller 268 with an outboard edge 269. As	roller extends across substantially the entire width of
		phantom line 270 represents, inboard edge 266 of	the deck." Col. 4:64-67.
		forward cutting deck assembly 262 overlaps outboard	
		edge 269 of rear cutting deck assembly 267 to create	Claims 4 and 15 (relevant representative portions):

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		the appearance of one continuous roller stripe."	"rear roller extends hetween the side plates and
·		'312 Patent col. 7, II. 34-42: "Similarly, with	supports the side plates for movement over the
		reference to FIG. 17, an inboard edge 271 of a roller	ground," Col. 5:16-18; Col. 8:32-35.
		edge 274 of a roller 276. Accordingly, the cutting	Prosecution History:
		deck positions depicted in the Figure provide a	A A CONCRETAINT AATOMOA (
		substantially continuous roller stripe. As shown in	'530 Patent:
		offset from an outboard edge 2/8 of a roller 280 may be	Dance 6 11 15
		depicted by phantom line 286. In this manner, an	1 aper 0, 11, 10.
		interrupted stripe is formed in the grass as the rollers pass over."	
		,	
		(312 Patent col. 7, II. 53-58: "Cutting deck 290 also	
		includes a pair of rear wheels 502 and a rear	
		pivotally coupled to each of the side plates 296 and	
		298. Each of the segments of segmented rear roller	
		assembly 304 are rotatably coupled and aligned along an axle 306."	
		'312 Patent col. 7, 11, 59-67: "FIG. 20 depicts yet	
		another cutting deck assembly 308 having a stepped	
		and segmented rear roller assembly 510. Kear roller	
		assembly 310 includes a pair of outboard follers 312	
		assembly 310 also includes an inhoard set of rollers	
		318 positioned between side plates 314 and 316 and	
		rotatably mounted on a stepped axle shaft 320. Rear	
		roller assembly 310 provides a striped pattern having	
		a width greater than the width of a deck 322."	
		'312 Patent col. 8, 11. 7-9: "FIG. 22 includes a "V"	
		shaped offset, segmented roller assembly 528 similar	

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 Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	to the assembly shown in FIG. 20 and depicted at reference numeral 310."	
	'312 Patent Figures 1-9, 11-20 and 22-23: Showing various arrangements of rollers used with cutting decks.	